

October 19, 2009

Envision San Jose 2040 General Plan Update Task Force  
City of San Jose Planning Division  
200 East Santa Clara Street, Tower 3  
San Jose, CA 95113

RE: General Plan 2040 Goals and Policies on Historic Preservation

Dear Task Force Members,

On behalf of the San Jose Historic Landmarks Commission (HLC), I would like to thank you for your commitment to the San Jose 2040 General Plan update and your thoughtful consideration of the wide range of issues that impact our city.

As you are well aware, a city's general plan is a critical and necessary statement of community priorities. A general plan's goals, objectives and policies are ensured a seat at the table in the public decision-making process. Because historic preservation promotes many of the city's goals and objectives, it is important that historic preservation be effectively integrated into General Plan 2040. Historic preservation is not about nostalgia and its benefits are more far reaching than just recognizing our architectural and cultural heritage. The preservation of appropriate remnants of a city's past provides multiple benefits important to the health and progress of the city.

On October 7, 2009, Planning Division staff presented draft historic preservation goals and policies for General Plan 2040 to the HLC. The HLC carefully reviewed and discussed the document and made a number of recommendations to staff, which we understand will be incorporated into the document you will consider on October 26, 2009.

While the HLC commented on the staff-presented draft historic preservation goals and policies, the HLC has been discussing for quite some time how to effectively integrate historic preservation goals and policies into the General Plan 2040 update. In the absence of a General Plan 2040 framework or draft, a subcommittee of the HLC has reviewed General Plan 2020 to prepare suggestions for more effectively addressing historic preservation and integrating historic preservation goals and policies into other areas of the General Plan that seek to accomplish related objectives.

While the HLC had already provided some specific text suggestions to staff, the HLC voted on October 7, 2009 to forward the following broader recommendations and comments to the Task Force:

- Employ strong policy language that constitutes a mandate to preserve certain categories of historic resources. Far from introducing more complication into the development review process and other city processes, clear and consistent policy would substantially simplify the treatment of historic resources and would streamline related development and other projects by reducing uncertainty.
- State consistently and in unambiguous terms throughout the updated General Plan the city's commitment to preservation. General Plan 2020 contains some encouraging language regarding historic preservation; however, experience has told us that the updated General Plan would be a much stronger historic preservation tool if the related goals and policies were stated in language that is decisive. These two strategies - a clear commitment to historic preservation and its integration throughout all relevant parts of the document - are crucial to providing solid policy protection for San Jose's historic resources.
- Weave support for the preservation of historic resources into all relevant sections of the updated General Plan, including the Vision, which establishes the plan's major overall objectives. Taken together, these policy statements should read as a clear message that the City of San Jose is determined that certain categories of historic resources will be preserved and protected and all historic resources will be respected. In addition to landmarks and historic districts, protected categories should include resources that have certain eligibility requirements, such as: being a contributing part of a cluster, a conservation area or distinctive neighborhood; having a special value in the community; being a good fit for preservation within a new project; having a compelling design and/or an important designer; etc.
- Promote the economic benefits of historic preservation. Preservation-based community development is a viable alternative to sprawl that creates affordable housing, generates jobs, supports independent businesses, increases civic participation, and bolsters a community's sense of place. Older buildings are frequently the most aesthetically appealing and often become attractions that generate value for themselves and their surrounding areas in the form of increased property values, tourism, etc.
- Promote the environmental benefits of historic preservation. The conservation and improvement of our existing built resources, including re-use of historic and older buildings, greening the existing building stock, and reinvestment in older and historic communities, is crucial to achieving environmental and sustainability goals. The existing building is the cheapest and greenest one.

- Maximize the use of the Historic Overlay currently shown on the Land Use/Transportation Diagram. The overlay should be graphically more prominent and should be used to identify Historic Districts, Conservation Areas, and other areas of historic interest. In addition, Landmarks should be identified graphically on the Diagram and/or on associated General Plan maps.
- Moderate the effect of General Plan policies that might unintentionally conflict with historic preservation or make the preservation of historic resources more difficult. For example, the current Two-Acre Rule and other Discretionary Alternate Use Policies promote uses, intensities or residential densities greater than the nominal uses, intensities or densities for some properties. Within General Plan 2040, any similar policies should be suspended or reduced for properties containing historic structures. The suspension or degree of reduction might be related to the category of the historic resource (landmark, contributing structure, structure of merit, etc.), and preserving the historic resource consistent with the Secretary of the Interior's Standards for Rehabilitation.
- Provide more meaningful protection for neighborhoods that are Conservation Areas or Distinctive Neighborhoods. Such protection should be based on the character defining elements that give each neighborhood its special identity. For many neighborhoods, an important element might be density. For some neighborhoods, important characteristics might be scale, architectural consistency, architectural variety, landscape, trees, etc.
- Weave in additional strategies to support successful historic preservation in San Jose:
  - Protect vacant, neglected and/or abandoned historic resources from vandals, fire, lack of maintenance, etc.
  - Explore "best practices" of cities that have successful historic preservation programs, particularly for issues like protection of vacant buildings, economic viability of preservation, etc. Engage in active discussion and consultation with such cities.
  - Develop and maintain a complete and up-to-date historic resource inventory to direct preservation efforts, reduce development and legal risk, and fully inform potential investors/buyers/community members. The availability to all stakeholders of information about what areas, structures, or facilities contribute to the historic fabric of the city and, thus, deserve preservation, is key to successful preservation. General Plan 2020 includes policy language that calls for completing an inventory of the city's historic resources. The updated General Plan should also include

such direction; however, methods for accelerating the preparation of these inventories need to be identified.

We hope that these recommendations and comments will be helpful in informing your discussion on historic preservation goals, policies, and implementation actions for General Plan 2040. Please do not hesitate to use the HLC as a resource in your future deliberations.

Sincerely,

A handwritten signature in cursive script, reading "Patricia Colombe". The signature is fluid and elegant, with a long, sweeping underline that extends to the right.

Patricia Colombe, Chair  
San Jose Historic Landmarks Commission